

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

EXPERIAN MARKETING SOLUTIONS,)	
INC., a Delaware Corporation,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 15-CV-00476
)	
JEREMY LEHMAN, an individual; THORIUM)	Hon. Robert Holmes Bell
DATA SCIENCE, LLC, a Michigan limited)	
liability company,)	
)	
Defendants.)	

DECLARATION OF RICHARD CUYLER ROBINSON

I, Richard Cuyler Robinson, declare:

1. I am a Vice President at Charles River Associates (“CRA”) and I was a Director of Legal Technology Services at Navigant Consulting, Inc. (“Navigant”) through October 21, 2016.

2. Navigant and CRA have been retained as consultants by Butler Rubin Saltarelli & Boyd LLP, counsel for Experian Marketing Solutions, Inc. (“EMS”) and by EMS to provide independent privileged digital forensic investigative and consulting services related to the above-captioned litigation. I submit this declaration in support of EMS’s reply in further support of *Plaintiff’s Motion to Compel and to Amend Deadlines*.

3. I have personal knowledge of the matters set forth in this declaration, and if called upon to do so, I could and would testify competently thereto.

4. In my capacity as a consultant in this matter with Navigant and with CRA, my respective teams and I have been responsible for collecting data from Defendant Jeremy

Lehman's electronic devices and from various other electronic repositories related to Defendant Defendants Lehman and Thorium Data Science, LLC ("Thorium") (together the "Collections").

5. I created the chart attached hereto as Exhibit 1 on August 4, 2016 at the direction of EMS's counsel to summarize the status of the Collections to date.

6. Column B of Exhibit 1 ("Source Account") lists electronic sources identified as likely to contain documents, information, or data relevant to this lawsuit. Column C ("Account Name or Identifier") is the account name or identifier of the accounts listed in Column B. Column D ("Note on Account") notes the relation of this account to the Defendants or other key actors/entities in this litigation. Column E ("Access / Other Comments") identifies the origin of the sources identified in Column B and/or describes the access that has or has not been provided to EMS and/or notes where Navigant or CRA has identified evidence of data alteration or potential deletion.

7. Column F of Exhibit 1 ("2015 Access/Collection") lists the dates in 2015 on which Navigant was able to access the sources listed in Column B. If Navigant was not able to access the source in 2015, or if the source had not yet been identified as a relevant repository, Column F notes that fact.

8. Column G of Exhibit 1 ("2016 Access/Collection") lists the dates in 2016 on which CRA was able to access the sources listed in Column B. If CRA has not been able to access a source in 2016, Column G notes that fact. Column G demonstrates that, as of August 4, 2016, Defendants have still not provided access to dozens of the sources listed in Column B.

I, Richard Cuyler Robinson, declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge.

Executed on August 5, 2016



538069

EXHIBIT 1

#	Source Account	Account Name or Identifier	Note on Account	Access / Other Comments	2015 Access/Collection	2016 Access/Collection
1	Atlassian JIRA Project Management Software	jira.thorium3.com	Used by Thorium team, administered by Trevor Watkins provided account info to Jeremy Lehman on Feb 10, 2015 and again on July 14, 2015. Lehman provided account info to Navigant and CRA to access content.	Trevor Watkins provided account info to Jeremy Lehman on Feb 10, 2015 and again on July 14, 2015. Lehman provided account info to Navigant and CRA to access content.	3/2/15	7/15/16
2	Atlassian Stash (Git)	git.thorium3.com	Used by Thorium team, administered by Trevor Watkins	Trevor Watkins provided account info to Jeremy Lehman on Feb 10, 2015 and again on July 14, 2015. Lehman provided account info to Navigant and CRA to access content.	3/2/15	7/15/16
3	Atlassian Confluence	confluence.thorium3.com	Used by Thorium team, administered by Trevor Watkins	Trevor Watkins provided account info to Jeremy Lehman on Feb 10, 2015 and again on July 14, 2015. Lehman provided account info to Navigant and CRA to access content.	3/2/15	7/15/16
4	Amazon Web Services (for Atlassian services)	Instance ID i-04143359	Used by Thorium team, administered by Trevor Watkins	Trevor Watkins provided AWS settings on March 3, 2015 (See exhibit 68 to complaint.) No access to AWS was provided.		
5	Google Account - All Services (including Gmail, Google Drive, Calendar, Contacts, and other Google services in use)	jeremy.lehman@gmail.com	Used by Jeremy Lehman	Lehman provided access to his account on March 19, 2015. Lehman refused to provide CRA with access to this account on July 14, 2016.	3/19/15	Refused Access
6	Google Account - All Services (including Gmail, Google Drive, Calendar, Contacts, and other Google services in use)	jeremy.lehman@gmail.com	Used by Jeremy Lehman. Lehman has stated that he is unable to log into this account.	Lehman stated that he is unable to access this account.		
7	Google Account - All Services (including Gmail, Google Drive, Calendar, Contacts, and other Google services in use)	jeremy.j.lehman@gmail.com	Used by Jeremy Lehman. Lehman has stated that he is unable to log into this account.	Lehman stated that he is unable to access this account.		
8	Holmail Account - Email	jeremy.lehman@hotmail.com	Used by Jeremy Lehman	Lehman provided access to this account on March 19, 2015.	3/19/15	Refused Access
9	Holmail Account - OneDrive	jeremy_lehman@hotmail.com	Used by Jeremy Lehman	Lehman required that pictures (image files) be excluded from the collection.	3/19/15	Refused Access
10	Holmail Account - Email	jeremy_lehman@hotmail.com	Used by Jeremy Lehman	Lehman provided access to this account on March 19, 2015.	3/19/15	Refused Access
11	Google Account - All Services (including Gmail, Google Drive, Calendar, Contacts, and other Google services in use)	Unknown Account Owner / Username	Used by Thorium team, administered by Trevor Watkins	Trevor Watkins provided a shared link to this folder to EMS on Feb 26, 2015.	2/27/15	Refused Access
12	Office 365 including Skydrive / OneDrive / Small Business Plan	Thorium3.onmicrosoft.com	Used by Thorium team, administered by Trevor Watkins	The Office 365 account was not identified as a repository of Thorium documents in 2015. We only learned about the existence of this account from documents produced by Lehman in February 2016.		
13	Web.com / Network Solutions	Account Settings	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially others.	Trevor Watkins provided Network Solutions settings on March 3, 2015 (See exhibit 68 to complaint.)	3/3/2015	(only certain settings were provided)
14	Web.com / Network Solutions	(Account # 35091971)	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially others.	Indication within Web.com logs that this account was altered.		
15	Web.com / Network Solutions	anna.thomas@thorium3.com	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially others.	Indication within Web.com logs that this account was altered.		
16	Web.com / Network Solutions	amir.behroz@thorium3.com	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially others.	Indication within Web.com logs that this account was altered.		
17	Web.com / Network Solutions	(Account # 35091971)	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially others.	Indication within Web.com logs that this account was altered.		
18	Web.com / Network Solutions	gordon.cowie@thorium3.com	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially others.	Indication within Web.com logs that this account was altered.		
19	Web.com / Network Solutions	(Account # 35091971)	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially others.	Indication within Web.com logs that this account was altered.		
		brain.lewis@THORIUM3.COM				7/18/16

#	Source Account	Account Name or Identifier	Note on Account	Access / Other Comments	2015 Access/Collection	2016 Access/Collection
20	Web.com / Network Solutions (Account # 35091971)	confluence-no-reply@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
21	Web.com / Network Solutions (Account # 35091971)	craig.attley-thistletwate@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
22	Web.com / Network Solutions (Account # 35091971)	crm@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
23	Web.com / Network Solutions (Account # 35091971)	david.bhajan-tome@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
24	Web.com / Network Solutions (Account # 35091971)	david.marks@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
25	Web.com / Network Solutions (Account # 35091971)	dexter.casey@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
26	Web.com / Network Solutions (Account # 35091971)	expn@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.	Indication within Web.com logs that this account was altered.	7/18/16	
27	Web.com / Network Solutions (Account # 35091971)	gareth.edge@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
28	Web.com / Network Solutions (Account # 35091971)	grish.das@THORIUMDS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
29	Web.com / Network Solutions (Account # 35091971)	gti-no-reply@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
30	Web.com / Network Solutions (Account # 35091971)	govind.asawa@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
31	Web.com / Network Solutions (Account # 35091971)	graeme.burnett@THORIUM-DS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
32	Web.com / Network Solutions (Account # 35091971)	graeme.burnett@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
33	Web.com / Network Solutions (Account # 35091971)	info@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
34	Web.com / Network Solutions (Account # 35091971)	irina.belenkova@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
35	Web.com / Network Solutions (Account # 35091971)	israel.delrio@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
36	Web.com / Network Solutions (Account # 35091971)	james.chan@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
37	Web.com / Network Solutions (Account # 35091971)	james.mcvey@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	

#	Source Account	Account Name or Identifier	Note on Account	Access / Other Comments	2015 Access/Collection	2016 Access/Collection
38	Web.com / Network Solutions (Account # 35091971)	james.sammMarco@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
39	Web.com / Network Solutions (Account # 35091971)	james.wilson@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
40	Web.com / Network Solutions (Account # 35091971)	jeff.lowellcock@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
41	Web.com / Network Solutions (Account # 35091971)	jeremy.lehman@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.	Jeremy provided access to his email account 3/20/2015.	3/20/15	7/18/16
42	Web.com / Network Solutions (Account # 35091971)	jeremy.lehman@THORIUMDS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
43	Web.com / Network Solutions (Account # 35091971)	ira-no-reply@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
44	Web.com / Network Solutions (Account # 35091971)	john.drake@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
45	Web.com / Network Solutions (Account # 35091971)	jyoti.juneja@THORIUM-DS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.	Indication within Web.com logs that this account was altered.		7/18/16
46	Web.com / Network Solutions (Account # 35091971)	jyoti.juneja@THORIUMDS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.	Indication within Web.com logs that this account was altered.		7/18/16
47	Web.com / Network Solutions (Account # 35091971)	leon.benderskiy@THORIUM-DS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
48	Web.com / Network Solutions (Account # 35091971)	leon.benderskiy@THORIUMDS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
49	Web.com / Network Solutions (Account # 35091971)	lewis.bramfitt@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
50	Web.com / Network Solutions (Account # 35091971)	madhusudan.khonda@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
51	Web.com / Network Solutions (Account # 35091971)	markwan@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
52	Web.com / Network Solutions (Account # 35091971)	mark.wan@THORIUMDS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
53	Web.com / Network Solutions (Account # 35091971)	mathew.whale@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
54	Web.com / Network Solutions (Account # 35091971)	matt.seeley@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.	Indication within Web.com logs that this account was altered.		7/18/16
55	Web.com / Network Solutions (Account # 35091971)	monika.jakober@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16

#	Source Account	Account Name or Identifier	Note on Account	Access / Other Comments	2015 Access/Collection	2016 Access/Collection
56	Web.com / Network Solutions (Account # 35091971)	munir.cochinwala@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
57	Web.com / Network Solutions (Account # 35091971)	nenad.jevtic@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
58	Web.com / Network Solutions (Account # 35091971)	nenad.jevtic@THORIUMDS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
59	Web.com / Network Solutions (Account # 35091971)	nissim.cohen@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
60	Web.com / Network Solutions (Account # 35091971)	peter.jurkovic@THORIUMDS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
61	Web.com / Network Solutions (Account # 35091971)	philippe.berckmans@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
62	Web.com / Network Solutions (Account # 35091971)	philippe.berckmans@THORIUMDS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
63	Web.com / Network Solutions (Account # 35091971)	prabhu.srikantan@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
64	Web.com / Network Solutions (Account # 35091971)	richard.ross@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
65	Web.com / Network Solutions (Account # 35091971)	sales@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.	Indication within Web.com logs that this account was altered.	7/18/16	
66	Web.com / Network Solutions (Account # 35091971)	sami.juma@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
67	Web.com / Network Solutions (Account # 35091971)	sarah.lit@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
68	Web.com / Network Solutions (Account # 35091971)	sergey.vladimiroff@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
69	Web.com / Network Solutions (Account # 35091971)	sid.ghatak@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
70	Web.com / Network Solutions (Account # 35091971)	sid.ghatak@THORIUMDS.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
71	Web.com / Network Solutions (Account # 35091971)	tim.mund@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	
72	Web.com / Network Solutions (Account # 35091971)	todd.cohen@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.	Indication within Web.com logs that this account was altered.	7/18/16	
73	Web.com / Network Solutions (Account # 35091971)	training@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.		7/18/16	

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Data Sources and Access Status
As of August 5, 2016

#	Source Account	Account Name or Identifier	Note on Account	Access / Other Comments	2015 Access/Collection	2016 Access/Collection
74	Web.com / Network Solutions (Account # 35091971)	trevor.watkins@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.	Indication within Web.com logs that this account was altered.		7/18/16
75	Web.com / Network Solutions (Account # 35091971)	trevor.watkins@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.	Indication within Web.com logs that this account was altered.		7/18/16
76	Web.com / Network Solutions (Account # 35091971)	vijay.rajaram@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
77	Web.com / Network Solutions (Account # 35091971)	zheng.geng-phan@THORIUM3.COM	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16
78	Web.com / Network Solutions (Account # 35091971)	Web site files htdocs	Used by Thorium team, administered by Trevor Watkins, Salar Ghahary, Jeremy Lehman and potentially, others.			7/18/16